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Memorandum

To: Charles Fitzsimmons
On-Scene Coordinator
EPA Region III
701 Mapes Road
Ft. Meade, MD 20755

From: John Fellingner
Senior Project Manager
Guardian Environmental Services Corporation, Inc.
1280 Porter Road
Bear, DE 19701

Date: September 14, 2007

Subject: Reduction of the Exclusion Zone for Non-essential Personnel at the
Elkton Farms Firehole Site.

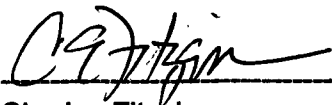
Charlie, the US Army Corps of Engineers (USACE) has recently revised its policies concerning the exclusion zone (EZ) and minimum safe distances (MSD) and for non-essential personnel subject to unintentional detonations at military munitions response project (MMRP) sites/responses. This policy revision includes all munitions and explosives of concern (MEC). The decision to implement the revised EZ and/or MSD is not mandatory, but left to the responsible official for the project.

The policy revisions can be found in *ERRATA SHEET No. 1, Engineering and Design, MILITARY MUNITIONS RESPONSE ACTIONS*, EM 1110-1-4009, dated 15 June 2007 and *ERRATA SHEET No. 2, Safety' BASIC SAFETY CONCEPTS AND CONSIDERATIONS FOR MUNITIONS AND EXPLOSIVES OF CONCERN (MEC) RESPONSE ACTION OPERATIONS*, EP 385-1-95a, dated 27 August 2004 (attached). These policy revisions permit the use of the hazard fragmentation distance (HFD), in lieu of the maximum fragment range (MFR) for the munition with the greatest fragmentation distance (MGFD) to determine the EZ and/or MSD for non-essential personnel.

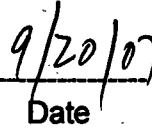
The current Elkton Farms Firehole Site (EFFF) EZ/MSD of 1095 feet is based upon the 40mm Mk2 projectile MFR (see Fragmentation Data Review Form, *Department of Defense Explosives Safety Board, Technical Publication - 16, Fragmentation Database* - attached). The 40mm Mk2 has been selected at the EFFF as the most credible MGFD. If the HFD for the 40mm Mk2 projectile was used in lieu of the MFR, the Elkton Farms Firehole Site EZ/MSD for non-essential personnel could be reduced to 200 feet (see Fragmentation Data Review Form).

Based upon this information, and discussions conducted between yourself and the GESC Response Manager, Mr. James Crosby, it appears that you wish to change the EFFS EZ/MSD to 200 feet from the existing 1095 feet for non-essential personnel subject to unintentional detonations resulting from EFFS activities.

Please indicate your concurrence to reducing the EZ/MSD for non-essential personnel by signing below. If your approval is provided, GESC will make the necessary revisions to the EFFS Accident Prevention Plan, Explosives Safety Submission, and Site Health and Safety Plan.



Charles Fitzsimmons
On-Scene Coordinator
EPA Region III


Date

Attachments: 1 – Errata Sheet No. 1.
2 – Errata Sheet No. 2
3 – Fragmentation Data Review Form

cc: J. Crosby, GESC RM
Site File

GESC